

In The United States District Court **RECEIVED**  
for the  
Western District of Pennsylvania

MAY - 8 2018

CLERK, U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

Patricia A. Scott,  
Plaintiff.

CASE NO. 18-600

Citizen Bank,  
Defendant.

1. Plaintiff Patricia A. Scott resides at 1842 Washington Street #304, Heidelberg, PA 15106. Phone number 412-501-7989.
2. Citizen Bank 525 William Penn Place, Pittsburgh, PA 15219.
3. U.S. Code > General Provisions Chapter 126 Subchapter III > 12182.
4. Defendant (name) citizen Bank is under the laws of the state of Pennsylvania and has its principal place of business in Pittsburgh.
5. Violation under the Americans with Disabilities Act of 1990 U.S. Code > Title 42 > Chapter 126 12101 and U.S. Code > General

## Provisions Chapter 126 Subchapter III > 12182.

6. On March 16, 2018 plaintiff was sitting in line for a long period but the bank tellers employees was ignoring her however she continue to be patient for a bank teller to assist her. Plaintiff notice that other customers entering into the bank they was allowed to walk in front of her. The bank tellers was deliberately skipping over her! After an extended time a bank teller employee finally asked plaintiff if she could assist her. The bank teller staff member walked over to her wheelchair! As usual plaintiff presented her with her debit Visa card, a refund check and she made a request for some coins. The bank teller return to her without her funds. Shortly after, a branch manager walked over to plaintiff's wheelchair. He was extremely hostile toward her and her disability. He stated that the bank will not be able to cash your check

today. The branch manager walked over to the bank tellers employees. He informed them not to assist me. Plaintiff made a request for his business card. She made a phone call! She ask him how he pronounce his first and his last name. She left the bank without her money! The debit card machine was too high for plaintiff's motorized wheelchair. She was physical unable to slide her visdebit card because the debit machine was not designed for wheelchair users. Plaintiff wasn't allowed to make a withdraw from her checking account because she was in a wheelchair.

5. Plaintiff was denied the right of full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of a place of public accommodation by a person who owns, leases (or leases to), or operates a place of public accommodation, Plaintiff was treated different because she was in a wheelchair.

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Plaintiff's civil rights was violated under the Americans with Disabilities Act of 1990 U.S. Code > Title 42 > Chapter 126 12101 and under U.S. Code > General provisions chapter 126 subchapter III > 12182.

Plaintiff seek statutory damages, compensatory damages and whatever the court deem to be appropriate in this civil case.

April 25, 2018

Patricia A. Scott "PROSE"  
Patricia A. SCOTT  
1842 Washington Street #304  
Heidelberg, PA 15106  
412-501-7989